

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

MAY 23 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLYDE JEFFERSON,

Defendant.

4:19CR398 ERW/PLC

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jennifer J. Roy, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the Government states as follows:

1. The defendant is charged in a twenty-one count Suppressed Indictment with interference with commerce by robbery, in violation of Title 18, U.S.C., Section 1951, an offense for which a maximum 20-year imprisonment is prescribed under Title 18; brandishing a firearm in connection with a crime of violence, in violation of Title, 18 U.S.C, Section 924(c), an offense for which a mandatory consecutive 7-year sentence is prescribed under Title 18; felon in possession of a firearm, in violation of Title 18, U.S.C., Section 922(g); and possession of counterfeit United States currency, in violation of Title 18, U.S.C., Sections 472 and 480. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

2. A complex investigation involving Federal and local law enforcement agencies has revealed that the defendant, acting with others known and unknown to investigators, used social media marketplaces such as Facebook Marketplace and OfferUp, to lure victims into what they believed were legitimate transactions for the sale of their cellular telephones. The defendant, who was oftentimes armed with a firearm, met the victims at locations in St. Louis City and County, and gave them counterfeit United States currency in exchange for their cellular telephones. On three occasions, the defendant brandished a firearm at the victims. On one occasion, the defendant shot a victim during the robbery. In February 2019, the defendant was arrested at the Lumiere Casino and found in possession of a stolen car, quantity of counterfeit United States currency, and a firearm.
3. The defendant's criminal history suggests that the defendant has a felony conviction for Counterfeiting, in Cause Number 1422-CR00046 and Resisting Arrest, in Cause Number 14SL-CR04842. The defendant also appears to have the following pending cases: Stealing over \$750.00 in St. Louis County, Cause Number 18SL-CR02782; Robbery in the First Degree/Armed Criminal Action/Unlawful Use of a Weapon, Cause Number 1922-CR00476; and Resisting Arrest/Armed Criminal Action/Tampering First Degree, Cause Number 1822-CR00991.
4. Even if the Court were to find that the defendant could overcome the presumption of detention in this case, the defendant's criminal history, and the circumstances of the charged conduct, some of which appears to have occurred while the defendant was on bond for pending State matters, reflects that there is a serious danger to the community and strong likelihood of non-compliance if the defendant is released. Therefore, there is no condition or combination of conditions that will reasonably assure the appearance of the defendant as required and the safety of any other person and the community.

WHEREFORE, the Government requests this Court pursuant to Title 18 U.S.C., §§ 3141 and 3142 to order a detention hearing three (3) days from the date of defendant's initial appearance and, after such hearing, further to order defendant detained prior to trial.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

BY: /s/ Jennifer Roy
JENNIFER J. ROY, #47203MO
Assistant United States Attorney